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Conducting Safety & Health Assessments

Contents

- 1.0 Purpose & Scope
- 2.0 Responsibilities
- 3.0 Definitions
- 4.0 Prerequisites
- 5.0 Precautions
- 6.0 Procedure/ Equipment
- 7.0 Implementation and Training
- 8.0 References
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- 10.0 Documentation



1.0 Purpose & Scope

This document describes the process of conducting Self-Assessments of Safety & Health (S&H) subject areas. The goal of the procedure is to provide a uniform methodology and protocol to ensure high quality Programmatic/Compliance Assessments & Limited Scope/Targeted Assessments by SHSD Industrial Hygiene (IH), Safety Engineering (SE), and Field Services (FS) personnel. Surveillances and compliance inspections are covered in other procedures such as DH-SOP-008 and SHR40100.

2.0 Responsibilities

- 2.1 The IH, SE, and FS Managers plan the schedule for assessments of their program areas and assign staff to serve as *Assessors*.
- 2.2 **Assessors** follow this procedure in planning, conducting, reporting results, and tracking the status of assessments.

3.0 Definitions

Major Noncompliance/nonconformance: A system element missing, or there is evidence that a system element is not implemented or not effective. Multiple minor nonconformances may be grouped together as a major, if they are all examples of the same type of nonconformance.

Minor Noncompliance/nonconformance: A single observed lapse in a procedure or requirement, with evidence that the overall system requirement is defined, implemented, and effective.

Opportunity for Improvement: A minor occurrence of not meeting a regulatory driver or best management practice. It may also include a recommendation of a possible program improvement.

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Observation: Not a nonconformance, but something that could lead to a nonconformance, if allowed to continue uncorrected; or an existing condition without adequate supporting evidence to verify that it constitutes a nonconformance.

Noteworthy Practice: Performance that exceeds expectations in terms of efficiency and/or effectiveness and provides a model for others to follow. A noteworthy practice is a positive condition or strength.

Issues hierarchy:

Level of Severity	ESH Directorate/ SHSD	OHSAS 18001/EMS14001	BHSO	
Highest	Major non-conformance	Major non-conformance	Level 1 Finding	
Moderate	Minor non-conformance	Minor non-conformance	Level 2 Finding	
Low	Opportunity for Improvement	Opportunity for Improvement	Level 3 Finding	
LOW	Observation	Opportunity for improvement		
Positive Practice	Noteworthy Practice	Noteworthy Practice	Noteworthy Practice	

4.0 <u>Prerequisites</u> Assessors must have subject matter expert knowledge of the topic to be assessed.

5.0 Precautions

Personal Protective Equipment: The use of personal protective equipment to protect the assessor is required when field reviews are done in areas with hazards. Appropriate personal protective equipment must be obtained, qualified, and used. Follow the Areabased PPE requirements on the Hazard Information Placard.

6.0 Procedure

6.1 Plan Assessments:

- The IH/SE/FS Managers select and plan the topics for periodic review in a 5-yr Assessment Plan. The plan is officially maintained on the SHSD website. (See Attachment 9.1 for an example of the 5-yr plan.)
- Applicable topics from the 5-yr Plan are incorporated each year into the annual ESHD and SHSD Business Plans.

6.2 Conduct Assessments:

- **Schedule an assessment:** The *Assessor* plans an assessment to meet the due date. A formal schedule can be used, such as the example in *Attachment 9.2: Compliance Self-Assessment Schedule*.
- **Scope an assessment:** The *Assessor* determines the scope of the assessment (e.g. what drivers apply, program elements to be reviewed, organizations to be reviewed, assessment team members, duration, etc.).

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- **Prepare Assessment checklist(s):** The Assessor prepares an assessment checklist(s) based on regulatory drivers and best management practices. See *Appendix 9.3* for an example of an Assessment Checklist. The checklist should contain at a minimum:
 - List of questions or items to be inspected (ideally, in a "yes/no" format)
 - Log of persons interviewed
 - Log of areas toured/inspected
 - Log of documents reviewed (with revision date or number).
- Conduct Assessments: The Assessor conducts reviews for compliance with applicable regulatory driver(s) using the checklist.
 - Written Program: Review SBMS Subject Area(s), SOP(s), training curriculum, forms, inventories, etc.
 - **Service Delivery:** Review internal services providers who support the subject area (e.g. Check qualifications of S&H professions & inspectors, medical surveillance/approval process, protective equipment specifications, PPE issuance, hazard assessments, exposure monitoring, etc.).
 - Line Implementation Field Review: Review line organization's documentation and performance of operations in compliance with requirements. This typically involves touring facilities to observe worker knowledge and compliance with SBMS requirements.
- 6.3 **Prepare Assessment Report:** The *Assessor* prepares the following doucments:
 - Factual Accuracy Draft Self-Assessment Report which is circulated to those assessed for review and comment. [See Attachment 9.4 for the recommended content of the Assessment Report.]
 - Final Self-Assessment Report when all issues with the draft are resolved.
- 6.4 **Prepare Corrective Action Plan:** If there are conditions that need correction from Assessments the Assessor prepares:
 - Draft Corrective Action Plan which is circulated to all organizations with an action for consensus.
 - Final Corrective Action Plan when all issues with the draft are resolved.
 - Causal Analysis and Extent of Condition analysis if indicated per requirements in the *Event and Issues* Subject Area.
- 6.5 **Prepare ATS Entry:** The SME prepares *ATS* wording for concerns/finding in the CAP and submits for entry into the Activity Tracking System (ATS) entry.

Note: The CAP and ATS entry can be used for S&H Surveillances when issues discovered during the can not be effectively addressed by informing the owner of the issue at the time of the surveillance.

6.6 Retain assessment records:

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- Final Assessment Report, SHSD Reports and Corrective Action Plans are sent for inclusion in the ATS record. ATS is the official record management location for SHSD Assessments and documents.
- Electronic files & hardcopy can be retained as unofficial records at the discretion of the assessor. These records need to be destroyed at 75 years from the date of creation.
- Working papers (e.g. copies of documents reviewed, field sheets, hand written notes, e-mail discussions, draft reports, factual accuracy drafts, etc.) should be discarded at the end of the assessment. If retained, these records need to be destroyed at 75 years from the date of creation.

7.0 Implementation and Training

Qualification Criteria: Individuals who have demonstrated knowledge of this procedure and the subject to be assessed can be qualified as an *Assessor*. Qualification is documented by completion of the attached *Job Performance Measure* or by examination.

8.0 References

- 8.1 Industrial Hygiene Auditing: A Manual for Practice, A. Leibowitz, AIHA Publications, 1994.
- 8.2 DH-SOP-008: ESH Directorate: Conduct an ESH Procedure.
- 8.3 Events & Issues Management Subject Area.

9.0 Attachments

- 9.1 Sample of SHSD 5-yr Assessment Plan
- 9.2 Sample *Project Schedule*
- 9.3 Sample of Assessment Checklist
- 9.4 Recommended Format & Contents of an Self-Assessment Report and Corrective & Preventative Action Plan
- 9.5 Regulatory Basis for Frequency of Self-Assessments
- 9.6 Job Performance Measure Qualification Form

10.0 Documentation

Document Development and Revision Control Tracking									
Prepared By: R. Selvey Date 02/26/13 IH Manager	Reviewed By: J. Ellerkamp 03/01/13 SE Manager J. Peters 03/01/13 FS Manager	Approved By: E. Nowak 03/01/13 SHSD Manager							
ESH Coordinator/ Date: none	Work Coordinator/ Date: none	SHSD Manager/ Date (see above)							
Facility Support Rep. / Date: none	Environ. Compliance Rep. / Date: none	Safety & Health Rep/Date: none							
QA Representative / Date: M. Pizzulli 07/15/06	Training Coordinator / Date: none	Other: none							
ISM Review - Hazard Categorization	Validation:	Original Effective Date:							
│	☐ Formal Walkthrough	IH40500: 11/04/03							
	☐ Desk Top Review	HP40500: 03/01/13							
□ Low/Skill of the craft	☐ SME Review								

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Revision Log

IH40500 Rev1: Periodic review Description of change: Added Attachment 9.6 the JPM for Qualification of Assessor. Revised the format of section 10 to most recent version. Reviewed the document and no changes were indicated. Reviewer/Date: *R*. Selvey 07/12/06

IH40500 Rev2: Clarify/enhance procedural controls. Description of change: Major re-write to combine IH40510 and IH40520 and streamline the documentation checklists. Reviewer/Date: R. Selvey 09/08/09

IH40500 Rev3: Clarify/enhance procedural controls. Description of change: Merger of IH40500 and 40510 with transfer of 5-yr

plan as Attachment 9.1. Reviewer/Date: R. Selvey 10/08/09

IH40500 Rev4: Clarify/enhance procedural controls. Description of change: Revision to update the record keeping porting in section 6. Reviewer/Date: R. Selvey 10/14/09

IH40500 Rev5: Clarify/enhance procedural controls. Description of change: Major revision includes "surveillances" and streamlines the process for assessments. Reviewer/Date: R. Selvey 02/94/11

HP40500 Rev0: Expanded scope to add Se and FS functions. SME Reviewer/Date: R. Selvey 02/26/13

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Attachment 9.1

Sample of the SHSD 5-yr Assessment Plan

Assessments	2000	2001	2002	2003	2004	2005	2006		2008	2009	2010	2011	2012	2013	2014	2015	2016	20	117	Driver	Owne
Blohazards: Blosafety In Research;	<u>IG</u>		1082				3542	3543	4394	CDC	5093	5164	6730			В				10CFR851 29CFR1910.1030	NMB
Bloodborne Pathogen Chemicalis: Chemicalis: Toxic Metalis (Pb, Be); Confined Spaces	40 88A 119	755	122	•	1860	351	3525 3542 3656 3785	254	4145	4485	5045 5095	616A 6304	-		A	-	A		-	29CFR1910.1000-1052 29CFR1910.1200 29CFR1910.1450 29CFR1910.1450 29CFR1910.1025 29CFR1925.59-64 29CFR1925.1102-1152 10CFR850 10CFR851	RLS/ NMB
Construction: Construction Safety, CVO; Excavation			1455					3861	-	-	5060 5155 5269 5456	6036 6037 6407 6457		Å			A			10CFR851 29CFR1926	THC
Energy Controls: <u>Interlooks; LOTO;</u> <u>Electrical</u> ; Electrical Tool Box		•		1471	1000	2725 3112 3443		3557 3623	4377		4796 5184 5454 5112 5095 5044	5638 6151 6161 6281	<u>6742</u>		A				A	10CFR851 29CFR1910.301-336 29CFR1910.137 29CFR1910.147 29CFR1926.400-449 NFPA70E	RB
Facility Safety: Fall Protection; Walking & Working Surfaces		-		-			-		-	4852	4797 5093	-	6512	A			A		-	29CFR1910.21-30 29CFR1926.104-107 29CFR1926.1050	MG
Material Handling: <u>Lifting</u> ; <u>Forklift</u> ; <u>Aerial</u> <u>Lifts</u> , HEMO						3078		3725			5127	<u>6458</u>	6677 6713	7079		A				29CFR1910.66-68 29CFR1910.176-184 29CFR1926.250-252 29CFR1926.450-556 29CFR1926.4400-1501	MG
Nanoscale Particles		-		-		-	-		4487	4705		9006			В			1	В	DOE	JWF
Noise & Hearing Conservation		551 89A	<u> </u>	2153	1980	2553 2823	3785		#354	4437		6164		В			В			10CFR851 29CFR1910.95	cw
NIR; Static Magnetic Fields; Lasers	44	487 88A 630		-	208	2502 2822	BH80 4013 3785	3693	DOE 4354	4685	5074	-			В			1	В	10CFR851 29CFR1910.97 29CFR1926.54	cw
Physical Hazards: Cryogenics; ODH Compressed Gas; Pressure; Explosives;										4796	4772 5067 6090 5638	6161	6732			A				29CFR1910.101-105 29CFR1901.109 29CFR1910.144	MG
Limited Scope/Targeted Assessments/Surveillances	2000	2001	2002	2003	2004	2005	2006	2007	200	8 200	19 20	10 2	011 :	2012	2013	2014	2015	2016	2017	Driver	Own
Asbestos					BHG	2553			417 438			. .	476			В			В	29CFR1901.1001 29CFR1926.1101	RLS
Aviation; Diving; Marine, <u>Traffic</u>	-						-	3624					-	5537			c			29CFR1910.401-441 29CFR1926.600-606 29CFR1926.1071-1091	FTI
BBP Exp Control Plan Review							3942	3943	428	456	9 90		154	6730	R	R	R	R	R	29CFR1910.1030	NM
Chemical Hygiene Plan Review	88A			1476	1980	2553	3829	3943	428	455			478	7858	R	R	R	R	R	29CFR1910.1450	RL
Confined Space Permits Cancelled		BSA	541	2107	BBA	255	15-12	2943	125		9 9	54	*64	5730	R	R	R	R	R	29CFR1910.146	M
Ergonomics				1477						472							С			none	FT
Exhaust Ventilation	68A		1347	-				внас	1 1 1 1 1 1				478			В	.		В	29CFR1910.94	WL
	_	1	_	1	1	1				- 1	- 1			- 1		-				29CFR1926.57	
140				· .	T .	T .			page 1					2052					c	none	RI
AQ Heat Stress	-			-			-		428		_		-	7058		•			c .	none 10CFR851	RL RL

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Attachment 9.2

Sample of an Assessment Project Schedule

	Task	Assigned to:	Duration	
1.0	Pre-Assessment Assistance to BNL Organizations			
1.1	Plan the assessment in the SHSD Assessment 5-yr Plan	SE, IH, FS Managers	(1 day)	
1.2	Scope the assessment, assessor(s) & schedule	SE, IH, FS Managers	(2 hours)	
1.3	Announce assessment to organizations & schedule field reviews.	Assessor	(2 hours)	Typically done as part of ESH Directorate Multiple topic/EMS/OHSAS Assessments
1.4	Offer preparation meetings as requested by line organizations	Assessor	(as needed)	
1.5	Prepare assessment checklists based on contractual/ regulatory drivers	Assessor	(5 days)	
2.0	Self-Assessment			
2.1	Conduct "In Brief" (pre-review) meeting with BNL managers (if requested).	Assessor	(2 hours)	
2.3	Conduct BNL written program vs. regulatory driver(s) review	Assessor	(4 days)	Milestone
2.5	Conduct field implementation reviews (inspections) of line organization operations	Assessor	(14 days)	Milestone
3.0	Self-Assessment Report & Corrective Action Plan Pr	eparation		
3.1	Conduct "Out Brief" meeting (if requested by BNL management).	Assessor	(1 day)	
3.2	Prepare Factual Accuracy Draft Assessment report	Assessor	(5 days)	Milestone
3.3	Distribute <i>F/A Draft</i> to impacted organizations for review & comment	Assessor	(2 hours)	
3.4	F/A Draft comment period	Line Orgs	(7-10 days)	
3.5	Resolve issues with F/A Draft and issue Final Assessment Report	Assessor	(3 days)	Milestone
3.6	Prepare Draft Corrective Action Plan (CAP)	Assessor	3 days	
3.7	Distribute <i>Draft CAP</i> to organizations with actions for comment	Assessor	1 day	
3.8	Comment period on Draft CAP	Line Orgs	(7-10 days)	
3.9	Resolve issues with <i>Draft CAP</i> and issue <i>Final Corrective Action Plan</i>	Assessor	3 days	Milestone
3.10	Prepare <i>ATS</i> wording for concerns/finding in the CAP and submit for entry.	Assessor	2 days	Final Milestone
			30+ days	

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Attachment 9.3

Sample of Self-Assessment Checklist

		ctorate-SHSD	:- A	4	Form Rev: 02/07/13	3		page	1 of 2
		Hygiene Multiple-To Self-Assessme			LINE ORGANIZATI	ONIMPLEME	NTATIO	N RE	/IEW
To	nical	■ BBP Exposure Co	ontrol Plan		■ Noise & Hearing	Conservation			
	opical Confined Spaces - Cancelled 2C Permits Biosafety in Research								
Org	ganiza	ation:			Dept/Div Code:				
Ass	sesso	or(s):			Assessment Date	2:			
L									
1.	No	ise & Hearing Co	onservatio	n Progran	Assessment		□ N/A	·ΙΥ	N
	_	as are posted or othe						+	+
a.	requ	uirements: chanism: Door Po							
b.		ection of PPE is form			propriate for the deg	ree of risk.		\top	T
C.		rkers are knowledge	able in the PP	E controls in	place and use prop	erPPE for an	ea	\top	\top
		/or operations. served or reviewed th	ne followina P	PE usage:				+	
		☐ Muffs		······································	ıgs 🔲	Canal bands			·
		Combo N	/luff/Plugs	☐ Cs	ncelling Muffs			-	-
	Oth		F - 2 - F -						1
d.		rs are trained in PPI per care, disposal.				ea, where nee	eaea,		
	Wo	rkers are retrained w	hen reason to	believe mis	understanding or la	ck of skill			
e.	PPI	E is stored in proper	manner						
	PPI	E is appropriately ma	intained betw	veen users					
f.	Ехр	osure monitoring co	nducted to ev	aluate comp	liance with occupati	onal exposure	limits?	?	
g.	Whe	ere there incidents, o	off-normal occ	urrences, S'	TS, or situations inve	olving worker l	ack of	+	+
	kno	wledge of hazards a	nd control in t	he last 24 m	onths. How were th	ey addressed	?		
h.	Exa	mples of worker fee	dback and me	chanisms to	obtain information t	from workers?		\top	T
								\perp	
i	Exa	mples of program im	provements:						
	Obs	servation:							
2.	Eff	ectiveness of Co	orrective A	ctions fro	m previous aud	lits (within	24 m	onths	s)
		Subject Area	Audit ID (ATS#)		Issue(s)		Effect N/A	tve Clo	sure N
	١		(A19#)					•	<u> </u>
a.	Noi	se							

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Attachment 9.3 (continued)

Sample of Self-As	sessment Checklist	
ESH Directorate- SHSD	Form Rev: 02/07/13	page <u>2</u> of
Industrial Hygiene Multiple-Topic Assessment FY13 Self-Assessment Checklist	LINE ORGANIZATION IMI	PLEMENTATION REVIEW
	umentation	
Documents Reviewed:		
Persons Interviewed:		
Areas Inspected:		
	<u> </u>	
Additional Comments:		
F-II		
Follow-up Issues:		
Summary of Non-conformances:		
Topic Finding		= = 0 (
		Minor
[end of form]		

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Attachment 9.4

Recommended Format & Content of a Self-Assessment Report & Corrective Action Plan

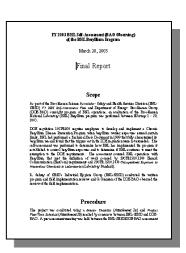
Assessment Report

Scope: A brief overview and summary (one to four paragraphs) describing the drivers, the date of the assessment, and the main topics addressed.

Procedure: Brief description of the procedure used to do the assessment, including links to checklists.

Conclusion & Recommendations: Detail description of "who and what" was assessed, what was found, and the extent of condition elsewhere (if known). Include with the report

- List of sites inspected
- List of documents reviewed
- List of persons interviewed
- Completed Checklists (optional)



Corrective and Preventative Action Plan

Overview and summary describing the Assessment, date of the assessment, and main topics addressed by the assessment, and the commitment to track the CAP in the BNL ATS. Table of Corrective Actions (such as the following suggested format):

Assessment #:	nnnn assigned by ATS
Assessment Title:	Fynn BNL Self-Assessment of the XXXX Program))
Assessment Owner:	Name of BNL employee, (usually the SHSD Manager)
Assessment Viewing:	Public or Private ($Private = SHSD \ only; \ Public = SHSD + other$
	organizations)

Condition ID#	nnnn.1	
Condition Title:	(Short description of the	e condition 60 characters or less)
Condition		
Description:		
Condition Owner:		
Condition Due Date:	(longest due date of act	ions associated with this condition)
(Action 1 associated	Action ID#	nnnn.1.1
with this condition)	Action Title:	(Short description of the action 60 characters or less)
	Action Description:	
	Action Closure Date:	
	Owning Organization:	

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Attachment 9.5

Regulatory Basis for Frequency of Self-Assessments/Surveillances

Mandated annual reviews:

- Chemical Hygiene Plan [29CFR191.1450(e)(4)]
- Confined Space Cancelled Permit Review [29CFR191.146(d)(14)]
- Bloodborne Pathogen Exposure Control Plan [29CFR1910.1030(c.)(1)(v) & (c)(1)(iv)(B)]

<u>Periodic reviews (unspecified frequency):</u>

- Respiratory Protection Program [29CFR1910.134 (c.)(1.)(ix.); (c.)(3.) & (l.)(1.): ANSI Z88.2 (5.3)]
- Lasers [ANSI Z136.1 (1.3.2.8)]

Reviews when there is reason to believe the program needs updating:

- Asbestos- General Industry [29CFR1910.1001 (f.)(2)]
- Beryllium [10CFR850.10(2)(c.) and 10CFR850.40(a)]

Reviews of written exposure control plans triggered by over exposure to OSHA PELs:

- Acrylonitrile [29CFR1910.1045 6 month revision cycle]
- Arsenic [29CFR1910.1018 6 month revision cycle]
- Benzene [29CFR1910.1028 revision cycle based on monitoring data]
- Butadiene, 1,3- [29CFR1910.1051 12 month revision cycle]
- Cadmium [29CFR1910.1027 12 month revision cycle]
- Ethylene Oxide [29CFR1910.1047 12 month revision cycle]
- Lead [29CFR1910.1025 and 29CFR1926.62 6 month revision cycle]
- Vinyl Chloride [29CFR1910.1017 6 month revision cycle]

No regulatory requirements for program reviews:

- Biohazard/Etiologic Agents [42CFR73; 7CFR331; 9CFR121; P434.1]
- HEPA testing [ANSI N510; N509]
- Local Exhaust Control Ventilation: [29CFR1910.94]
- Hazard Communication Program [29CFR1910.1200]
- Heat Stress [ACGIH TLV]
- Noise and Hearing Conservation Program [29CFR1910.95]
- Non-ionizing radiation [29CFR1910.95]

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Attachment 9.6

Candidate's Name			Life Number:			
Practical Skill Evaluation Criteria Qualifying Performance Standard				Unsat. Recov.		
_	Planning the assessment/surveillance	Demonstrates knowledge of preparing a plan with the key assessment steps in Attachment 9.2: Self-Assessment Schedule.				
2.	Scoping the assessment/surveillance	Demonstrates knowledge of the elements setting the proper Scope of an assessment and selecting organization to assess				
3.	Driver Review	Demonstrates knowledge of preparing assessment checklists based on contractual drivers.				
4.	Written Program Review	Demonstrates knowledge of reviewing written program (SBMS Subject Area, SOPS, etc.) for compliance with applicable regulatory driver(s).				
5.	Program Service Delivery Review	Demonstrates knowledge of reviewing services providers for compliance with applicable regulatory driver(s).				
6.	Line Implementation Field Review	Demonstrates knowledge of field implementation and compliance by line organizations.				
7.	Assessment Report	Demonstrates knowledge of preparing a Draft Self-Assessment report, factual accuracy review, and Final Self-Assessment Report.				
8.	Corrective Action Plan	Demonstrates knowledge of preparing a <i>Corrective Action Plan</i> . Knows to prepare <i>ATS</i> wording for concerns/findings.				
aco OF		performing this task as demonstrated within this JPM and th	e corre	spondii	ng	
•	ndidate Signature:		Date:			
	•	isfactorily performed each of the above listed steps and is ca	apable ⁽	of perfo	 orm	
	ask unsupervised. luator Signature:		Date:			